**IN THE UNITED STATES BANKRUPTCY COURT**
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
**PHILADELPHIA DIVISION**

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| IN RE: JULIAN O. and LATRELL B. GARNETT<br>Debtor.<br><br>JULIAN O. and LATRELL B. GARNETT,<br>Plaintiffs,<br><br>v.<br><br>REAL TIME RESOLUTIONS, INC. as agent for PYOD, LLC,<br>Defendant. | Chapter 13<br><br>Case No. 16-17459JKF<br><br>Adv. No. _________ |

**COMPLAINT TO DETERMINE SECURED STATUS**

1. Debtors own their residence 213 W. Abbotsford Avenue, Philadelphia, PA with a value of $78,295.00. **Exhibit A**.
2. Debtors have a mortgage with Wells Fargo with a balance of approximately $115,000.00.
3. The 2nd mortgage to Real Time Resolutions, Inc. as agent for PYOD, LLC is wholly unsecured pursuant to 11 U.S.C. 506 and In Re: McDonald.
4. Debtor's Affidavit is attached as **Exhibit B.**

**WHEREFORE,** Debtors pray that this Honorable Court enter an order finding the 2nd mortgage wholly unsecured.

Dated: October 24, 2016

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